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LAW DEPARTMENT

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February 20, 2024

VIA ECF

Hon. Margaret M. Garnett
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

Re: *M.L. et al., v. N.Y.C. Dep't of Educ.*, 23-cv-9657 (MMG)(VF)

Dear Judge Garnett:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek solely attorneys' fees, costs and expenses for legal work on administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 30-day extension of Defendant's time to respond to the Complaint, from February 22 to March 22, 2024. This is the second request for an extension, the first extension having been granted on December 13, 2023. (ECF 11) Defendant also respectfully requests that the joint status letter due Feb. 22 be adjourned to March 22, 2024 as well. Defendant has made an offer of settlement, which Plaintiffs are considering. The requested extension should allow the parties the necessary time to engage in settlement discussions and hopefully resolve this matter without further burdening the Court. Plaintiffs consent to these requests.

Accordingly, Defendant respectfully requests that Defendant's time to respond to the Complaint be extended to March 22, 2024, with a next joint status letter due that same date either informing the Court that matter has been fully resolved or proposing a briefing schedule.

Thank you for considering these requests.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.

Special Assistant Corporation Counsel

cc: Lauren Baum, Esq. (via ECF)

Application GRANTED. The deadlines for Defendant to respond to the Complaint and for the parties to submit their joint status letter are both extended to **March 22, 2024**.

SO ORDERED. Dated 2/21/2024

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE